

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

Cheryl A. Munday and Margaret Devine,  
on behalf of themselves and others  
similarly situated,

Plaintiffs,

-vs-

Beaufort County, Philip Foot, Quandara  
Grant, John Does 1-5 and Jane Does 1-5,

Defendants.

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) CIVIL ACTION NO.: 9:20-cv-02144-DCN-BM  
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**DEFENDANTS' ANSWERS TO**  
**26.01 INTERROGATORIES**

TO: ROBERT S. METRO, ESQUIRE, ATTORNEY FOR PLAINTIFF:

The Defendants, above named, answering Interrogatories pursuant to the Rules of Federal Procedure and pursuant to Local Rule 26.01 of the U.S. District Court, state as follows:

- A) State the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in each claim, and state the basis and extent of said interest.

**ANSWER: The Defendants are unaware of any persons or entities with any subrogation interests at this time.**

- B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: The Defendants have no preference as to how this case is tried.**

- C) State whether the party submitting these responses is a publicly owned company, and separately identify: (1) each publicly owned company of which it is a parent, subsidiary partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly

owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER: Not applicable. The Defendants are not publicly owned company.**

- D) State the basis for asserting your claim in the division in which it was filed. (or the basis of any challenge to the appropriateness of the division.)

**ANSWER: The Beaufort Division is appropriate.**

- E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, please provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single Judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: The Defendant is not aware of this action being related to any other matter filed in District Court, whether civil or criminal.**

- F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleadings reflecting the correct identification.

**ANSWER: The Defendants are properly identified.**

- G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: The Defendants are not aware, inclusive of themselves, who is liable to the Plaintiff for the matters set forth in Plaintiff's Complaint.**

{Signature Page Follows}

HOWELL, GIBSON & HUGHES, P.A.

By: s/Mary Bass Lohr  
Mary Bass Lohr  
Post Office Box 40  
Beaufort, SC 29901-0040  
(843) 522-2400  
Attorney for Defendants  
Federal Bar No: 7804

Beaufort, South Carolina

June 5, 2020

CERTIFICATE OF SERVICE

I certify that I served the foregoing Answers to 26.01 Interrogatories upon all counsel of record, in this proceeding, via electronic mail, and/or via United States Postal Service, with proper postage affixed thereto, to counsels' last known email address and/or mailing address on this 5<sup>th</sup> day of June, 2020.

By: s/Mary Bass Lohr  
Mary Bass Lohr